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December 8, 1993

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Re: IBEW COPE I.D. No. C0027342
July 1993 and August 1993 Monthly Reports

Dear Mr. Davis:

This office represents the International Brotherhood of Electrical Workers Committee on Political Education ("IBEW COPE") and its treasurer, Jack F. Moore. I am writing in response to your letter of December 1, 1993 stating that the monthly reports filed by IBEW COPE for July and August 1993 appear to show contributions in excess of those permitted by the Federal Election Campaign Act. Those reports show contributions to the Democratic National Committee ("DNC") of \$15,000 and \$5,000, both reported on Schedule B for Line 23 (Contributions to Federal Candidates/Committees), despite an earlier contribution in April to the DNC of \$15,000.

IBEW COPE has not exceeded the limits imposed by the Act. IBEW COPE, however, did place the two contributions referred to in your letter on the wrong Schedule B, an error that is now being corrected.

Our records show that IBEW COPE made a \$15,000 contribution to the Democratic National Committee's federal account in April 1993. That contribution was reported on the schedule B for Line 23 in the April monthly report. IBEW COPE made the two subsequent contributions of \$15,000 and \$5,000 referred to in your letter, in June and July to the DNC's non-federal "Max-Pac" account. I am enclosing a letter from the DNC to IBEW COPE confirming that all contributions from IBEW COPE to the DNC, after the initial contribution of \$15,000, were understood as contributions to its